

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CEMCO, LLC,

Plaintiff,

v.

KPSI INNOVATION, INC. et al.,

Defendants,

MARKOWITZ HERBOLD PC,

Garnishee.

CASE NO. 2:25-mc-00028-LK

ORDER REQUESTING  
SUPPLEMENTAL BRIEFING

This matter comes before the Court on Plaintiff CEMCO, LLC's Applications for a Writ of Garnishment for property in which Defendants/Judgment Debtors KPSI Innovation, Inc., Serina Klein, Kevin Klein, and James Klein, are believed to have a substantial nonexempt interest and which may be in the possession, custody, or control of the garnishee, Markowitz Herbold PC. Dkt. Nos. 17–19.

1 Plaintiff's proposed writs use the form provided in Section 6.27.105 of the Revised Code  
2 of Washington, which applies to writs for a continuing lien on earnings. Dkt. Nos. 17-2, 18-2, 19-  
3 2. The continuing lien on earnings form is tailored for wage-based garnishments and appears to be  
4 inapplicable here, where the garnishee is Defendants' counsel in the case in which the underlying  
5 judgment was entered (and not, for example, Defendants' employer). *See CEMCO LLC v. KPSI*  
6 *Innovations Inc. et al.*, No. 2:23-cv-00918-JLR (W.D. Wash.).

7 The Court therefore requests that Plaintiff submit supplemental briefing within 14 days of  
8 this Order addressing whether a continuing lien on earnings form is proper here. Alternatively,  
9 Plaintiff may file amended applications for writs of garnishment using the regular form provided  
10 in Section 6.27.100 of the Revised Code of Washington.

11 Dated this 5th day of August, 2025.

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Lauren King  
14 United States District Judge  
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